

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

D. DEATON, et al

*Plaintiff,*

v.

PATRICIA STEPHENS, et al

*Defendants.*

CASE NO. 2:23-cv-00713-RDP

**RESPONSE IN OPPOSITION TO MOTION TO SEAL**

COME NOW Plaintiffs respectfully request this Honorable Court deny Defendant Kim Davidson and Defendant Kim Davidson Law Office, LLC's Motion to Seal. In further support thereof, Plaintiffs state as follows:

1. Defendant Kim Davidson and Defendant Kim Davidson Law Office, LLC filed (doc. 93) regarding restricting communication with the media, even though Defendant Kim Davidson has provided public interviews regarding the same issues.
2. The undersigned was not provided with any communication from Defendants to this motion prior to filing their Motion for Immediate Hearing (doc. 93).

3. Plaintiffs provided a response and supporting documentation to allegations raised by Defendants to this motion requesting immediate action.
4. Defendants to this motion acknowledge that at least part of their statements (doc. 104 p. 7) raised to this Court were false.
5. All supporting documentation filed in response to the Defendants to this motion, excluding the unrelated return of service (doc. 114), are public documents including the record of the related court proceedings or public records from the Alabama State Bar.
6. The undersigned apologizes to the Court for not taking better care to ensure the records were redacted before this Court.
7. This Court entered an Order on July 25, 2023. (doc. 115)
8. Plaintiffs emailed all Defendants requesting any additional redactions.
9. None of the Defendants requested additional redactions.
10. Plaintiffs conferred with Defendants to this motion prior to the status report.
11. Plaintiffs provided a copy of the redactions to the Defendants to this motion to confirm the redactions prior to filing new copies. The related filings were approximately 100 pages.
12. Defendants to this motion provided no additional redactions to Plaintiffs prior to filing the latest Motion to Seal. (doc. 136)
13. Following this Court's order, Plaintiffs filed new copies that redacts confidential information pursuant to Rule 5.2. The new, redacted copies were provided to Defendants to this motion prior to filing.
14. Plaintiffs did not file redacted copies of these public documents to humiliate anyone, and Plaintiffs did not initiate these related filings.

**WHEREFORE**, Plaintiffs prays this Court deny Defendant Kim Davidson and Defendant Kim Davidson Law Office, LLC's Motion to Seal.

Respectfully submitted this 31<sup>st</sup> day of July, 2023.

/s/ *Scott Tindle*

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 31 day of July, 2023, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

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